

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

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Order Instituting Rulemaking Regarding  
Revisions to the California Universal  
Telephone Service (LifeLine) Program

R.11-03-013  
(Filed March 24, 2011)

**COMMENTS OF AT&T ON ASSIGNED COMMISSIONERS' RULING ADVISING  
PARTIES OF INTENT TO PLACE PROPOSED DECISION DELAYING  
IMPLEMENTATION OF REVISED ELIGIBILITY CRITERIA FOR CALIFORNIA  
UNIVERSAL TELEPHONE SERVICE (LIFELINE) PROGRAM**

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May 1, 2017

AT&T<sup>1</sup> hereby provides comments on the *Assigned Commissioner's Ruling Advising Parties of Intent to Place Proposed Decision Delaying Implementation of Revised Eligibility for California Universal Telephone Service (LifeLine) Program* ("ACR").

## **I. INTRODUCTORY COMMENT**

AT&T's comments filed earlier in this proceeding detailed the reasons for aligning the California Lifeline eligibility criteria with the newly adopted Federal LifeLine eligibility criteria.<sup>2</sup> While AT&T will not repeat those reasons here, failure to align the eligibility criteria of the two programs brings consumer confusion, significant operational burdens on the California Lifeline Administrator ("CLA") and participating providers, and increases overall expense of the California LifeLine program.

If the Commission nevertheless does create California-only eligibility criteria, it will take a collaborative work effort of the Communications Division the CLA, and providers to design and establish the requirements in order for necessary processes to be in place. For example, the CLA must be required to transmit new information to providers. Namely, when the CLA transmits the approved LifeLine consumers to providers, the CLA will have to indicate whether the consumer is eligible for the California-only program or the Federal and California programs. This information would also need to be reflected in the Weighted Average Report Detail produced each month by the CLA. If the direction of the ACR is adopted, this information has to be provided starting November 1, 2017, so providers can comply with federal law on eligibility

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<sup>1</sup> Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C); AT&T Corp. (U 5002 C); Teleport Communications America, LLC (U 5454 C); and AT&T Mobility LLC (New Cingular Wireless PCS, LLC (U 3060 C); AT&T Mobility Wireless Operations Holdings, Inc. (U 3021 C); and Santa Barbara Cellular Systems, Ltd. (U 3015 C)), collectively hereinafter "AT&T."

<sup>2</sup> See Comments of AT&T on Assigned Commissioner and ALJ's Ruling Requesting Comments on Workshops and Federal Communications Commission's Third Report and Order, Issuing Data Requests, pp. 4-8 (Oct. 11, 2016).

for the Federal LifeLine program. Providers not only need to know what discounts LifeLine consumers are entitled to receive, but also need to know whether reimbursement is to be sought and received from California only or both California and the Federal government.

AT&T requests that the Commission revise the California LifeLine program as outlined above.

Dated this 1st day of May 2017 at San Francisco, California.

Respectfully submitted,

/s/

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